

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

JOHN J. PENTZ,

Plaintiff,

v.

ALM,

Defendant.

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) Civil Action No. 05-10207-JLT
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Joint Statement for Scheduling Conference

The parties hereby submit this Joint Statement in compliance with Fed. R. Civ. P. 16 and 26 and the corresponding Local Rules of the U.S.D.C. for the District of Massachusetts.

Proposed Pre-trial Schedule

The parties propose the following pre-trial schedule:

1. amendments to the pleadings shall be completed by February 28, 2006;
2. service of, and compliance with, written discovery requests shall be completed by March 31, 2006;
3. the deadline for completion of depositions, including, if applicable, the terms for taking and using videotape depositions shall be June 30, 2006;
4. the identification of trial experts and the disclosure of reports in compliance with Fed. R. Civ. P. 26(a)(2) shall be by June 30, 2006 and rebuttal expert reports shall be submitted by July 31, 2006;
5. all motions for summary judgment shall be filed by August 31, 2006
6. a settlement conference, to be attended by trial counsel and, in the discretion of the judge, their clients, one or more case management

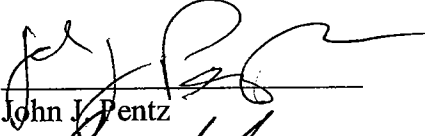
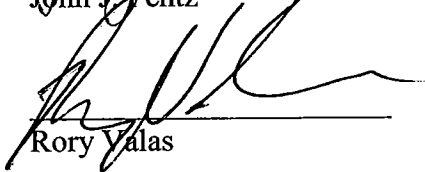
conferences and the final pretrial conference shall be completed 30 days after the judge's disposition of the summary judgment motions; and

7. the joinder of any additional parties shall be completed by May 30, 2006.

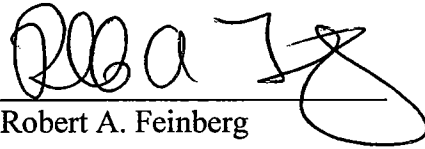
The parties agree to the presumptive limits set on discovery under Local Rule 26.1(c).


Certification of Conference Concerning Budget and ADR

Plaintiff and his counsel state and affirm that they conferred concerning the costs of the litigation and the various alternative courses, and concerning the possibility of using alternative dispute resolution programs such as those outlined in LR 16.4.


John J. Pentz

Rory Valas

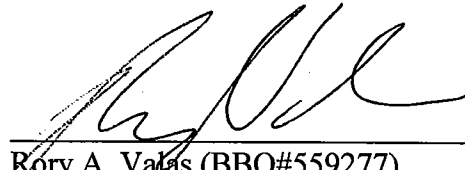
Defendant and its counsel state and affirm that they conferred concerning the costs of the litigation and the various alternative courses, and concerning the possibility of using alternative dispute resolution programs such as those outlined in LR 16.4.


Robert A. Feinberg


Devereux Chatillon

Plaintiff:


JOHN J. PENTZ,
By his attorneys,



Rory A. Valas (BBO#559277)
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250 Summer Street
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(617) 399-2200

Defendant:

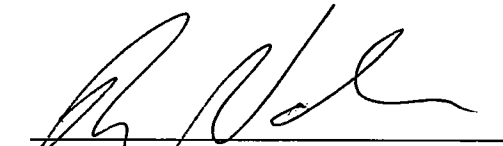
ALM
By its attorneys:



Devereux Chatillon, Esq.
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New York, NY 10020
(212) 398-5815

CERTIFICATE OF SERVICE

I hereby certify that on November 29, 2005, I served a copy of the following upon all counsel of record by first-class mail.



Rory A. Valas